

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

VOLKSWAGEN GROUP OF AMERICA, INC.,

Plaintiff,

v.

Civil Action No. 1:19-cv-01574

**THE UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,**

Defendants.

**[PROPOSED] ORDER GRANTING PLAINTIFF'S *EX PARTE* MOTION FOR
TEMPORARY ASSET RESTRAINT AND EXPEDITED DISCOVERY**

This Court, having considered the *ex parte* Motion by Plaintiff Volkswagen Group of America, Inc. for a temporary restraining order including temporary asset restraint and expedited discovery and for good cause shown, it is hereby

ORDERED that the Motion shall be, and hereby is, granted; and it is further

ORDERED that PayPal shall immediately freeze all PayPal accounts associated with Defendants identified in Schedule A to the Verified Complaint and restrain and enjoin the transfer of any monies held in such accounts until further ordered by this Court; and it is further

ORDERED that Plaintiff may immediately serve limited discovery on PayPal sufficient to discover the amounts of any monies held by PayPal in association with Defendants identified in Schedule A to the Verified Complaint as well as any name, email address, address, telephone number, and bank account associated with such PayPal account(s);

ORDERED that Plaintiff may immediately serve limited discovery on eBay sufficient to learn the identities of Defendants identified in Schedule A to the Verified Complaint as well as any name, email address, address, telephone number, PayPal account, or other payment accounts associated with such eBay account(s); and it is further

ORDERED that any information disclosed to Plaintiff in response to discovery issued pursuant to this Order may be used solely for the purpose of protecting Plaintiff's rights as set forth in the Verified Complaint.

SO ORDERED THIS ____ day of _____, 2019.

United States Magistrate Judge

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